MORRISON & FOERSTER LLP
Jamie A. Levitt
Damion K.L. Stodola
1290 Avenue of the Americas
New York, NY 10104-0050
(212) 468-8000
Attorneys for Plaintiff Verified Identity Pass, Inc.

Lori A. Schechter (*pro hac vice* pending) MORRISON & FOERSTER LLP 425 Market Street San Francisco, California 94105-2482 (415) 268-7000

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

VERIFIED IDENTITY PASS, INC., DBA CLEAR REGISTERED TRAVELER,

Plaintiff,

-against-

FRED FISCHER, SAFLINK CORPORATION, and FLO CORPORATION,

Defendants.

Case No. 07 Civ. 6538 (JGK)

AFFIDAVIT OF VANESSA MAZANDI IN SUPPORT OF TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION

STATE OF NEW YORK : ss.: COUNTY OF NEW YORK)

VANESSA MAZANDI, being duly sworn, deposes and says:

- 1. I am the Manager of Corporate Development for Verified Identity Pass, Inc. ("Verified"). I make this affidavit in support of Verified's request for a temporary restraining order and preliminary injunction. Unless stated otherwise, I have personal knowledge of the matters stated in this affidavit, and if called as a witness, could testify competently thereto.
- 2. I began my employment at Verified on August 21, 2006. For the year prior to that date, I was living in Costa Rica and spent the year teaching in the town of Nosara. Prior to my time in Costa Rica, I was a student at Yale University studying English. I had no involvement

with the Registered Traveler business or any other travel-related business before I joined Verified in August 21 of 2006.

- 3. I am informed and believe that prior to the commencement of my employment at Verified, there was no individual who had the email address I now have at Verified, which is based on my name.
- 4. I have never signed up at the website www.businesstravelcoalition.com for anything, including to join, or to receive emails. In fact, I have never been to the website www.businesstravelcoalition.com. I do not know, nor have I ever met, Kevin Mitchell. I have never provided my Verified email address to Kevin Mitchell or the Business Travel Coalition.
- 5. The first time I received any email from the Business Travel Coalition, or Mitchell@businesstravelcoalition.com was the July 10, 2007 email attached to the Beer Declaration as Exhibit C [or D]. I have no idea how my Verified email address, which was created on or about the first day of my employment on August 21, 2006, became a part of the Business Travel Coalition's mailing list.

Vanessa Mazind

Sworn to before me this 1st day of August, 2007

Notary Public

RICHARD A. ANDREWS
Notary Public, State of New York
No. 01AN5018079
Qualified in New York County
Commission Expires Sept. 29,

1 aanhens

Nov. 16, 2009